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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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Mr. Stephen Garth
Atlantic Division Naval Facilities Engineering Command
Code **EV22DH**
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SUBJECT: Draft Technical Memorandum - Phase II Baseline Ecological Risk Assessment
Work Plan for Blows Creek; St. Juliens Creek Annex, Chesapeake, Virginia;
October 2004

EPA has completed review of the subject document and offers the following comments for your consideration:

Section **2.1**, on page **2**, states that mercury is widespread and at similar concentrations throughout many locations in the Elizabeth River. The section further states that the elevated mercury identified near the mouth of Blows Creek was linked to Site **4**; however, a portion of the mercury detected in this and other sediment samples in Blows Creek may originate from upstream sources and/or enter Blows Creek via tidal **flux** from the Southern Branch of the Elizabeth River. The attached map includes concentrations of mercury in the Elizabeth River from the NOAA watershed database to help in the evaluation. Information on the sediment dynamics between the Elizabeth River and Blows Creek is necessary to evaluate the link between sites, contamination in the creek and the Elizabeth River.

Section **2.2.1**, on page **3**, states that up to three composite fish samples will be collected from Blows Creek using minnow traps. The section states that the fish sampling locations are shown in Figure **1**. The document does not contain such a figure. Figure **1-2** contains site locations in the watershed while Figure **2** depicts the proposed sediment sampling locations at the mouth of the creek.

Thank you for the opportunity to review this document. Please contact me if you have questions or wish to discuss these comments.

Sincerely,

Todd Richardson
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